



**Mary L. Henze**  
Asst. Vice President  
Federal Regulatory

AT&T Services, Inc.  
1120 20<sup>th</sup> Street, Suite 1000  
Washington, D.C. 20036  
Phone 202 457-2041  
E-Mail: mary.henze@att.com

August 26, 2011

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-A325  
Washington, DC 20554

***Re: WC Docket No. 10-90, Connect America Fund; GN Docket No. 09-51, National Broadband Plan for our Future; WC Docket No. 07-135, Establishing Just and Reasonable Rates for Local Exchange Carriers; WC Docket No. 05-337, High-Cost Universal Service Support; CC Docket No. 01-92, Developing a Unified Intercarrier Compensation Regime; CC Docket No. 96-45, Federal State Joint Board on Universal Service; WC Docket No. 03-109, Lifeline and Link-Up***

Dear Ms. Dortch,

On August 24, 2011, the undersigned, Joel Lubin, David Hostetter, Christopher Heimann, and Brian Benison, all of AT&T, met in separate meetings with members of the Wireline Competition Bureau staff to discuss various aspects of Universal Service (USF) and intercarrier compensation (ICC) reform and the ABC Plan, in particular.

Participating for the FCC to discuss ICC matters were Rebekah Goodheart, Victoria Goldberg, Doug Sloten, Kevin King, Dan Ball, Randy Clarke, Marcus Maher, and Jenny Prime. Participating for the FCC to discuss USF matters were Carol Matthey, Rebekah Goodheart, Amy Bender, Steve Rosenberg, Brad Gillen, Katie King, Alexander Minard, Patrick Halley, and Margaret Wiener of the Wireless Telecommunications Bureau. The ICC discussion focused primarily on how the ABC Plan's rate transition proposal (set forth in the July 29, 2011, ABC Plan "Framework" document at p.11) would work. In the course of that discussion, the staff requested more detail regarding whether and how the plan would affect certain transport services, including entrance facilities and certain transiting services.

The Universal Service discussion focused on ABC Plan provisions associated with Connect America Fund broadband service obligations, including build-out requirements, usage and/or capacity standards, and service speed requirements. AT&T explained that each element proposed in the ABC Plan represented a balance the coalition members struck between the desire to ensure broadband deployment and how to achieve it in a fiscally responsible way. Thus the 5-year build-out requirement in the ABC Plan and the proposed supported service speed of "4 up/768 down" were necessary in order to enable the CAF to have a meaningful impact on broadband deployment given the \$2.2B budget. The FCC also asked whether requiring CAF recipients to provide increased

service speeds in the later years of the funding commitment (i.e., year 10) would be feasible, and if so, how it could be implemented. AT&T explained that, consistent with ABC Plan Coalition comments on the record, increasing speed requirements after funding would be very problematic. AT&T strongly encouraged all obligations, whether for Year 1 or Year 10, to be made clear and complete before beginning the CAF process. AT&T also confirmed that the coalition had not agreed upon a usage/capacity requirement for supported broadband service and the ABC Plan did not include such a requirement.

In accordance with the Commission's rules, this notice is being filed electronically with the Secretary for inclusion in the public record. If you have any questions, please do not hesitate to contact me at (202) 457-2041.

Sincerely,

*/s/ Mary L. Henze*

Mary L. Henze

|     |              |              |
|-----|--------------|--------------|
| cc: | C. Matthey   | P. Halley    |
|     | R. Goodheart | S. Rosenberg |
|     | B. Gillen    | J. Prime     |
|     | T. Harkrader | V. Goldberg  |
|     | D. Slotten   | K. King      |
|     | D. Ball      | R. Clarke    |
|     | M. Maher     | A. Bender    |
|     | K. King      | M. Wiener    |
|     | A. Minard    |              |